

To the Commissioner of the United States Patent and Trademark Office:

In re: Trademark Application Serial No. 88110111

Applicant's Statement

The Applicant, by the undersigned authorized corporate officer, being duly sworn, hereby state the following in the above-referenced matter:

In comparing two trademarks for confusing similarity, the Examining Attorney must compare the marks for resemblances in sound, appearance and meaning or connotation. In this case, the applied-for mark ends with "CO", which results in the different pronunciations between these two marks. The appearance are distinct in that the applied-for mark is in standard characters, while the registered mark is in design form. It violates the anti-dissection rule to focus on the "prominent" feature of a mark, ignoring other elements of the mark, in finding likelihood of confusion. The design distinction that conveys totally different commercial impressions should not be ignored. To conclude, these two marks differ in sound, design and appearance.

Above all, it's necessary to note that the Applicant is willing to delete Children's and infant's apparel, namely, jumpers, overall sleepwear, pajamas, rompers and one-piece garments; Nightshirts; Sweaters; Trousers; Underpants; Combinations.

The Cited Mark's goods are Athletic apparel, namely, shorts, tank tops, t-shirts, and pullovers" in International Class 025.

My company's goods are "Boots; Caps being headwear; Gloves; Hosiery; Neckties; Sandals; Shoes" in International Class 025.

Although there is overlap between the products, since they are all goods in Class 025, the goods do not compete with one another. This is because Cited Marks' goods and my company's goods address different needs. Registrant's goods mainly focus on athletic apparel, while our goods are primarily related to daily accessories. Our goods and Registrant's goods are distinct in function, it is not particularly likely that consumers would seek to purchase those goods at the same time. Therefore, there can be no presumed relationship between those consumers targeted by my company and those targeted by Registrant. Thus there is little confusion between them.

For the reasons listed above, my company respectfully requests that the Examining Attorney withdraw the refusal to register our Mark and approve the Application for publication.

Respectfully submitted,

I certify that I am a corporate officer of the legal entity who is the Applicant/Owner for the trademark/service mark identified in this document duly authorized by the Board of Directors to act on behalf of the Applicant, AND that the information I provided here is all true and accurate. I understand that Title 18, United States Code, Section 1001 makes it a crime to: 1) knowingly and willfully; 2) make any materially false, fictitious or fraudulent statement or representation; 3) in any matter within the

jurisdiction of the executive, legislative or judicial branch of the United States. I certify that the above information is all true and accurate to the best of my abilities.

Dated: March 17, 2019
Shenzhen, China

Signed: /s/ Zhan Jiani
Print Name: Zhan Jiani
Title: President
Company: Hesi Shenzhen International Trading
Co., Ltd.